

State Water Resources Control Board

February 1, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7017 2680 0000 6289 5494

Mr. Richard Thurlow
Hazardous Material Inspector
City of San Diego
9601 Ridgehaven Court, Suite 310
San Diego, California 92123
rlthurlow@sandiego.gov

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT FLEET SERVICES, SOUTHERN POLICE SUBSTATION,
1120 27TH STREET, SAN DIEGO**

Dear Mr. Thurlow:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on December 14, 2017, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Perform Designated Operator (DO) Inspections – The monthly DO reports did not include information about the diesel tank.	Diesel	December 1, 2016	Ongoing	23 CCR 2715
2	Failure to Maintain Monitoring Plan – The monitoring plan for both of the unleaded tanks identifies the UDC monitoring as using a float chain assembly; however, a standalone sensor was observed at the time of inspection.	Unleaded north and Unleaded south	December 14, 2017	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1), 2711(a)(9)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	Failure to Monitor Product Piping – The sensors in the fresh oil and waste oil sumps were not able to detect a leak at the earliest opportunity because the test boots were on. The sensor in the diesel piping sump was not able to detect a leak at the earliest opportunity because it was not located on the product piping side of the sump. The sensors and test boots were placed in the correct locations at the time of inspection.	Fresh oil, Waste oil, and Diesel	December 14, 2017	December 14, 2017	23 CCR 2630(d)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and County of San Diego Department of Environmental Health within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Ms. Rebecca Green
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
rebecca.green@waterboards.ca.gov

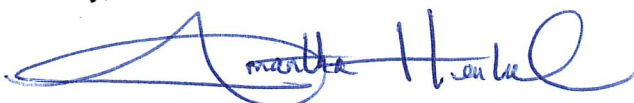
Local CUPA

Mr. Robert Rapista
Supervising Environmental Health Specialist
Underground Storage Tank Program
County of San Diego Department of
Environmental Health
P.O. Box 129261
San Diego, California 92112-9261
robert.rapista@sdcounty.ca.gov

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: See next page.

cc: *(via email only)*

Mr. Craig Fergusson, P.E.
TEEM Program Manager
City of San Diego
cfergusson@sandiego.gov

Ms. Maryam Dorsey, Chief
Hazardous Material Division
County of San Diego Department of
Environmental Health
maryam.dorsey@sdcounty.ca.gov

Mr. Robert Rapista
Supervising Environmental Health Specialist
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